

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

The Muffin Mam, Inc.,

Debtors.

Chapter 7

Case No. 21-02909-hb

**NOTICE OF RECLAMATION OF
CREATIVE BAKERY SOLUTIONS**

PLEASE TAKE NOTICE that by and through its undersigned counsel, Creative Bakery Solutions, LLC (“Creative Bakery”) hereby files this Notice of Reclamation for the reclamation of goods pursuant to 11 U.S.C. §546(c) upon Debtor the Muffin Mam, Inc. (“Muffin Mam”) and Debtor’s counsel, to reclaim certain assets (the “Goods”) that are subject to reclamation. The Goods were sold in the ordinary course of Creative Bakery’s business and delivered on credit terms to, and received by Muffin Mam during the forty-five (45) days prior to filing of its bankruptcy petition. Muffin Mam attaches as Exhibit A and incorporates by reference its written demand for the return of the goods and its attempt to resolve this request prior to making this request for reclamation with the court.

Attached hereto as Exhibit B is a copy of the invoices for the deliveries made within the forty-five (45) day time period.

Please take further notice that Creative Bakery reserves all of its right and remedies available under the United States Bankruptcy Code including the right to supplement this notice.

Wherefore, Creative Bakery hereby requests an order from this Court allowing Creative Bakery to reclaim the goods pursuant to 11 U.S.C. §546(c) still in the possession of Muffin Mam and such other and further relief as the court deems just and proper.

Respectfully Submitted,

Dated: December 3, 2021

/s/ Richard R. Gleissner

U.S. Dist. ID 5389

Gleissner Law Firm, LLC

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Attorneys for Creative Bakery Solutions, LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certified that a true and correct copy of the foregoing instrument has been served on this 3rd day of December, 2021 upon the parties listed below and all parties requesting service via ECF Notification:

Harrison Penn, Esquire
McCarthy, Reynolds & Penn, LLC
PO Box 11332
Columbia, SC 29211-1332

United States Trustee
Strom Thurmond Federal Building
1835 Assembly St., Suite 953
Columbia, SC 29201

John K. Fort, Esquire
PO Box 789
Drayton, SC 29333

Reid Dyer, Esquire
Moore & Van Allen, PLLC
78 Wentworth Street
Charleston, SC 29401
Attorney for the Pinnacle Bank
Dated: December 3, 2021

/s/ Richard R. Gleissner

US Dist. ID # 5389

Gleissner Law Firm, LLC

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Attorneys for Creative Bakery Solutions